

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MIDAS FUND, INC.,

Plaintiff,

- against -

GAMMON GOLD, INC.,

Defendant.

Index No.: 07-CV-6707 (NRB)

**NOTICE OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Brooke E. Pietrzak, a member in good standing of the bar of this Court, hereby moves for an Order allowing the admission pro hac vice of:

FREDERICK M. RALPH
Dorsey & Whitney LLP
50 South Sixth Street, Suite 1500
Minneapolis, Minnesota 55402
(612) 340-2600

FREDERICK M. RALPH is a member in good standing of the Bar of the States of Montana and Minnesota. There is no pending disciplinary proceeding against FREDERICK M. RALPH in any State or Federal court.

Dated: November 20, 2007
New York, New York

Respectfully submitted,

DORSEY & WHITNEY LLP

By Brooke E. Pietrzak
Brooke E. Pietrzak (BP-7314)

250 Park Avenue
New York, NY 10177
Telephone: 212-415-9200

FILED
U.S. DISTRICT COURT
S.D. OF N.Y.
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**DECLARATION IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

BROOKE E. PIETRZAK, being duly sworn, hereby deposes and says as follows:

1. I am a partner with the law firm of Dorsey & Whitney LLP, counsel for defendant Gammon Gold, Inc. ("Gammon") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement in support of Gammon's motion to admit Frederick M. Ralph as counsel pro hac vice in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in June of 1998. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Ralph is an associate with Dorsey & Whitney LLP and works in the firm's Minneapolis office. Mr. Ralph has practiced law for five years and is admitted to practice before the courts of Montana and Minnesota. Certificates of Good Standing from each of these courts for Mr. Ralph are attached hereto as Exhibit A.

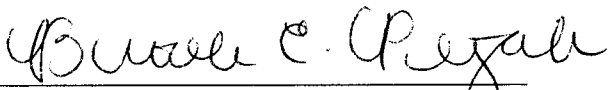
4. I have found Mr. Ralph to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure. Mr. Ralph is also fully familiar with the factual and legal issues presented in this action.

5. Accordingly, I am pleased to move the admission of Frederick M. Ralph, pro hac vice.

6. I respectfully submit a proposed order granting the admission of Frederick M. Ralph, pro hac vice, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Frederick M. Ralph, pro hac vice, to represent Gammon in the above-captioned matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 20, 2007 at New York, New York.



Brooke E. Pietrzak (BP-7314)

I, Christopher L. Manos, Executive Director of the
State Bar of Montana, do hereby certify that

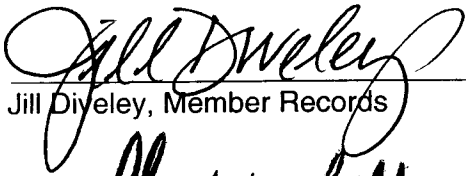
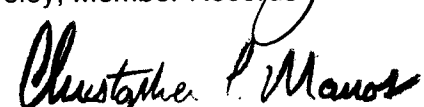
Frederick M. Ralph

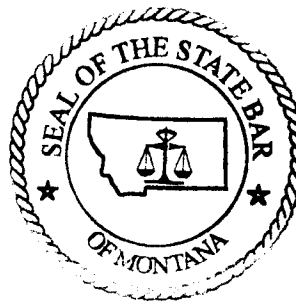
was admitted to the State Bar of Montana on

November 6, 2003

and that his name appears upon the Roll of
Attorneys in this office as an **Active** member.

*As of today's date, this attorney is in good
standing with the State Bar of Montana.**


Jill Dyeley, Member Records

Christopher L. Manos, Executive Director



Dated: November 14, 2007

State Bar of Montana
P.O. Box 577
Helena, MT 59624
(406) 442-7660

**This does not represent the records of the Montana Supreme Court's
Commission on Practice, the agency in charge of discipline information. To obtain
disciplinary records please contact their office at 215 N. Sanders, Helena, MT
59620, or call 406-444-2608.*

STATE OF MINNESOTA IN SUPREME COURT

Certificate of Good Standing

This is to certify that the following lawyer is in good standing.

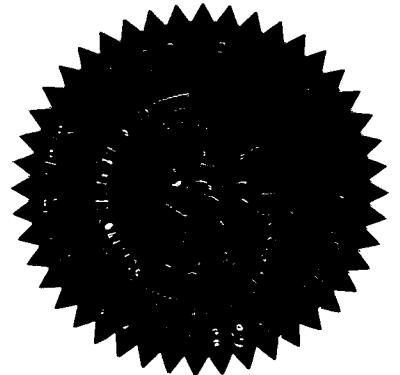
FREDERICK MATTHEW RALPH

was duly admitted to practice as an lawyer and counselor at law in all the courts of this state on

October 25, 2002

Given under my hand and seal of this court on

November 13, 2007



Fredrick K. Griffner

Fredrick K. Griffner
Clerk of Appellate Courts

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MIDAS FUND, INC.,

Plaintiff,

- against -

GAMMON GOLD, INC.,

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**[PROPOSED]
ORDER FOR ADMISSION
PRO HAC VICE**

Upon the Notice of Motion to Admit Counsel Pro Hac Vice and the Declaration in Support of Motion to Admit Counsel Pro Hac Vice, and the exhibits thereto;

IT IS HEREBY ORDERED that FREDERICK M. RALPH is admitted to practice pro hac vice as counsel for defendant Gammon Gold, Inc. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at www.nysd.uscourts.gov.

Dated: November __, 2007

U.S.D.C. Judge

ATTORNEY AFFIRMATION OF SERVICE

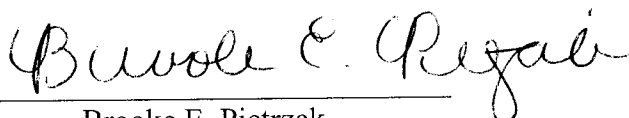
Brooke E. Pietrzak, Esq., being duly sworn, says:

I am an attorney admitted to practice in the State of New York, am not a party to this action, am over 18 years of age, and am associated with the law firm of Dorsey & Whitney LLP, 250 Park Avenue, New York, New York 10177.

On November 20, 2007, I caused the within **Notice of Motion to Admit Counsel Pro Hac Vice and Declaration in Support of Motion to Admit Counsel Pro Hac Vice**, and the exhibits thereto, to be served by first class mail, a true and correct copy being in a securely enclosed, postage-paid wrapper, addressed to the following individuals:

Debra Guzov, Esq.
GUZOV OFSINK, LLC
600 Madison Avenue, 14th Floor
New York, New York 10022

Attorneys for Plaintiff



Brooke E. Pietrzak